Cox Exhibit No. 17 Admitted

ITEM: Cox 1-28

In how many states throughout the states constituting the current territory served by ILEC affiliates of Verizon Corporation have the ILEC affiliates included in their interconnection agreements provisions for such affiliates to forecast their own outbound traffic?

REPLY:

The number of states with contracts allowing for Verizon Forecasting of Outbound Traffic is 33. The 8/29/00 comprehensive contract template, as well as the three subsequent versions which are executed and effective in all states across the current Verizon footprint, have the following language in Section 2.4.1 of the Interconnection Attachment:
"Where the Parties have agreed to use Two Way Local Interconnection Trunks, prior to ordering any Two-Way Local Interconnection Trunks from Verizon, **CLEC shall meet with Verizon to conduct a joint planning meeting ("Joint Planning Meeting"). At that Joint Planning Meeting, each Party shall provide to the other Party originating CCS (Hundred Call Second) information, and the Parties shall mutually agree on the appropriate initial number of Two-Way [For NY & CT: Meet Point A (high usage) and Meet Point B (final)/For all other states: End Office and Tandem] Local Interconnection Trunks and the interface specifications at the Point of Interconnection (POI)."

Verizon's current comprehensive model template contains similar language in section 2.4.2 of the Interconnection Attachment:
"Prior to ordering any Two-Way Interconnection Trunks from Verizon, ***CLEC Acronym TXT*** shall meet with Verizon to conduct a joint planning meeting ("Joint Planning Meeting"). At that Joint Planning Meeting, each Party shall provide to the other Party originating Centium Call Second (Hundred Call Second) information, and the Parties shall mutually agree on the appropriate initial number of Two-Way End Office and Tandem Interconnection Trunks and the interface specifications at the Point of Interconnection (POI)."

COX EXHIBIT NO. 18
✓ Admitted

02/28/00
Compliance Filing

New York State
Carrier-to-Carrier Guidelines
Performance Standards and Reports

Bell Atlantic Reports

February 2000

Pre-Ordering	PO-1	Response Time OSS Ordering Interface	10	5
	PO-2	OSS Interface Availability	3	8
	PO-3	Contact Center Availability	4	10
	PO-4	Change Management Notice	3	12
	PO-5	Average Notification of Interface Outage	1	13
	PO-6	Software Validation	1	14
	PO-7	Software Problem Resolution and Timeliness	4	15
	PO-8	Manual Loop Qualification	2	16
Ordering	OR-1	Order Confirmation Timeliness	14	18232728
	OR-2	Reject Timeliness	12	3032
	OR-3	Percent Rejects	1	
	OR-4	Timeliness of Completion Notification	8	
	OR-5	Percent Flow-Through	3	
	OR-6	Order Accuracy	3	
Provisioning	PR-1	Average Interval Offered	11	34384345
	PR-2	Average Interval Completed	16	505254–
	PR-3	Completed within Specified Number of Days (1-5 Lines)	11	55
	PR-4	Missed Appointments	12	
	PR-5	Facility Missed Orders	3	
	PR-6	Installation Quality	3	
	PR-7	Jeopardy Reports	1	
	PR-8	NOT IN USE IN NY	–	
	PR-9	Hot Cut Performance	9	
Maintenance & Repair	MR-1	Response Time OSS Maintenance Interface	6	59616365
	MR-2	Trouble Report Rate	5	69
	MR-3	Missed Repair Appointments	5	
	MR-4	Trouble Duration Intervals	10	
	MR-5	Repeat Trouble Reports	1	
Network Performance	NP-1	Percent Final Trunk Group Blockage	4	71737576
	NP-2	Collocation Performance	8	
	NP-3	Switching Performance	0	
	NP-4	Notification of Network Outage	0	
Billing	BI-1	Timeliness of Daily Usage Feed	4	788081
	BI-2	Timeliness of Carrier Bill	1	
	BI-3	Billing Accuracy	2	
Operator Services	OD-1	Operator Services – Speed of Answer	2	8384
	OD-2	LIDB, Routing and OS/DA Platforms	0	
General Standards	GE-1	Directory Proofs	0	8686
	GE-2	Poles, Ducts, Conduit and Rights of Way	0	
Glossary		Glossary of Terms		87

A	Specials and Trunk Maintenance Code Descriptions
B	Provisioning Codes
C	Pre-Ordering Details
D	Bona Fide Request Process
E	Local Number Portability Process
F	E911 Updates
G	Repair Disposition Codes
H	Flow-Through Order Scenarios
I	Trunk Forecasting Guide
J	Collocation Forecasting Guide
K	Statistical Methodology
L	Product Interval Summary
M	Order Accuracy Details
N	Table of Measures, Sub-Metrics and Product Disaggregation
O	Test Deck – Weighted transaction Matrix

INTRODUCTION

This section of the New York State Carrier-to-Carrier Guidelines Performance Standards and Reports provides the metrics and performance standards that will be applicable to New York Telephone Company, d/b/a Bell Atlantic-New York ("BA-NY"). A comprehensive explanation of the definitions of the standards, the measurement methodologies, reporting levels, geography covered, and current product intervals is included. In addition, this section includes a glossary and appendices that provide explanatory material related to the metrics and standards. The appendices also include a description of a statistical methodology that will be applied to help assess whether there is any difference between the delivery of BA-NY retail services and its wholesale products.

BA-NY will provide Performance Reports on a monthly basis to the Competitive Local Exchange Carriers ("CLECs") that were members of the working group in Case 97-C-0139 and to any CLEC that has previously made a request to receive Performance Reports issued pursuant to the Interim Guidelines, adopted in Case 97-C-0139. Any other CLEC that wants to obtain reports produced pursuant to the Guidelines must contact the Account Manager that BA-NY has designated for that CLEC to make the appropriate arrangements to receive the reports.

Section 5

Network Performance

(NP)

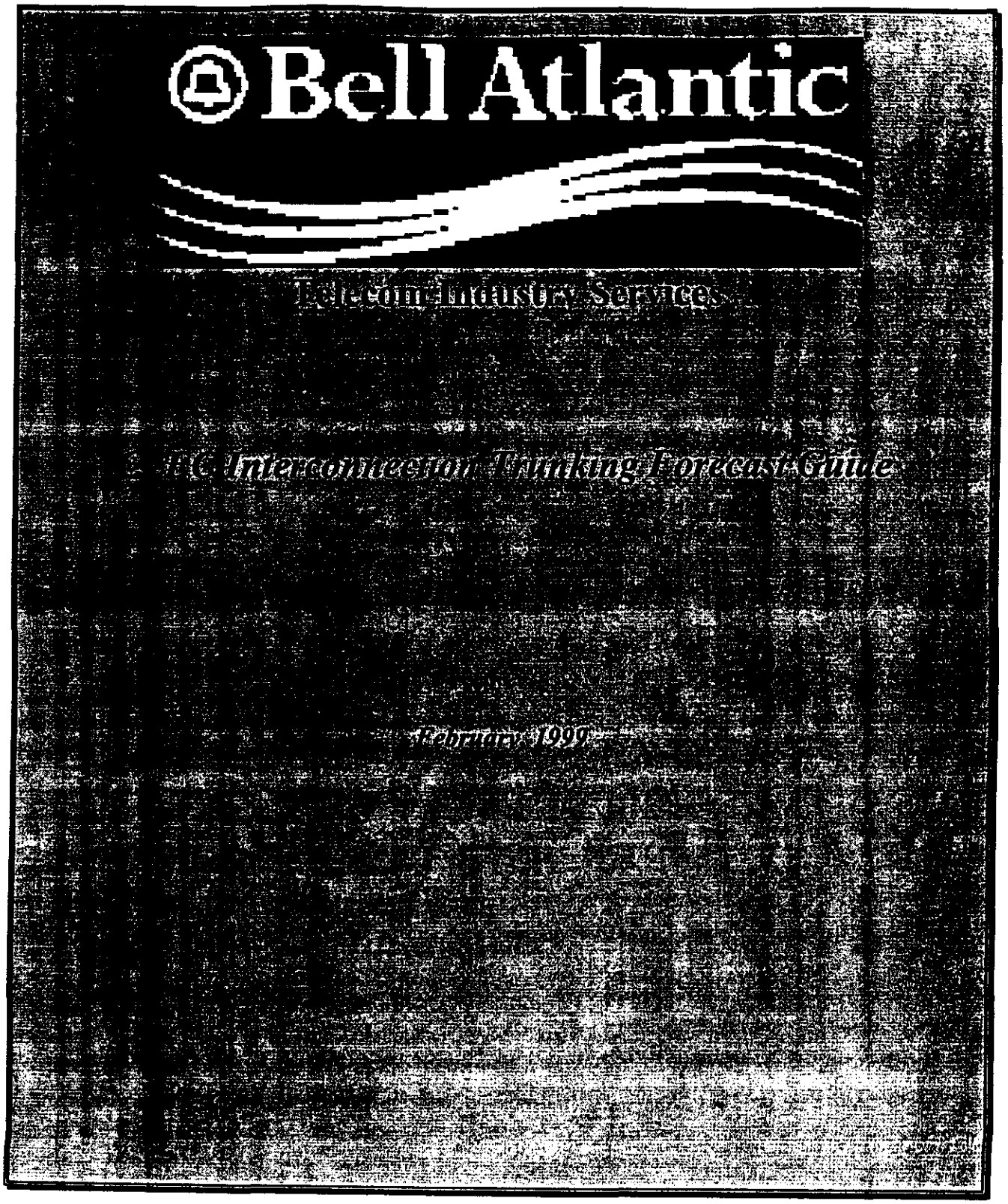
	Function	Number of Sub-metrics
NP-1	Percent Final Trunk Group Blockage	4
NP-2	Collocation Performance	8
NP-3	Switching Performance	0
NP-4	Notification of Network Outage	0

Network Performance (NP)

Function
NP-1 Percent Final Trunk Group Blockage
Definition
The percent of Final Trunk Groups that exceed blocking design threshold. Monthly trunk blockage studies are based on a time consistent busy hour. The percentage of BA trunk groups exceeding the applicable blocking design threshold will be reported. Data collected in a single study period to monitor trunk group performance is a sample and is subject to statistical variation based upon the number of trunks in the group and the number of valid measurements. With this variation, for any properly engineered trunk group, the measured blocking for a trunk group for a single study may exceed the design-blocking threshold. [Tables specify the blocking threshold (Service Threshold) under which Bell Atlantic operates, above which it is statistically probable that the design blocking standard is not being met and the trunk group requires servicing action. For B.005 design, this is trunk-groups exceeding a threshold of about 2% blocking.] For this measure, BA Retail Trunks are defined as Common Final Trunks carrying Local Traffic between offices. Typical common final trunks are between end offices and access tandems. CLEC Trunks are dedicated final trunks carrying traffic from the BA access tandem to the CLEC.
Exclusions
Trunks not included: • IXC Dedicated Trunks • Common Trunks carrying only IXC traffic BA will electronically notify CLECs (operational trunk staffs), of the following situations for blocked trunks. This notification will identify that BA has identified a blocked trunk group and that the trunk group should be excluded from BA performance. Unless the CLEC responds back with documentation that the information on the condition is inaccurate, the trunk group will be excluded: • Trunks blocked due to CLEC network failure • Trunks that actually overflow to a final trunk, but are not designated as an overflow trunk • Trunks blocked where CLEC order for augmentation is overdue • Trunks blocked where CLEC has not responded to or has denied BA request for augmentation • Trunks blocked due to other CLEC trunk network rearrangements
Performance Standard:
Because Common trunks carry both retail and CLEC traffic, there will be parity with Retail on common trunks. For individual trunk groups carrying traffic between BA and CLECs, BA will provide explanation (and action plan if necessary) on individual trunks blocking for two months consecutively. An individual trunk should not be blocked for three consecutive months. End User Standard: 602.1(m) Final Trunk Group - The last choice group of common interoffice communications channels for the routing of local, operator and/or toll calls. 603.3(g) Percent Final Trunk Group Blockages. This metric is defined as the monthly percentage of blocked calls on any local, toll and local operator final trunk groups and has a performance threshold of 3.0% or less for each final trunk group. 603.4(d)(3) For Percent Final Trunk Group Blockages, a Service Inquiry Report shall automatically be filed whenever performance is not at or better than 3.0 percent for three consecutive months.

18-5

Report Dimensions – NP-1 Percent Final Trunk Group Blockage		
Company: • BA Retail • CLEC Aggregate • CLEC Specific	Geography: • NY State	
	Retail: • BA Common Final (Local)Trunks	Trunks: • CLEC Trunks
Sub Measure		
NP-1-01	% Final Trunk Groups Exceeding Blocking Standard	
Calculation	Numerator	Denominator
	Count of Final Trunk Groups that Exceed Blocking Threshold for one month exclusive of trunks that block due to CLEC network problems as agreed by CLECs.	Total number of final trunk groups
NP-1-02	% Final Trunk Groups Exceeding Blocking Standard –(No Exceptions)	
Calculation	Numerator	Denominator
	Count of Final Trunk Groups that Exceed Blocking Threshold.	Total number of final trunk groups
NP-1-03	Number Final Trunk Groups Exceeding Blocking Standard – 2 Months	
Calculation	Numerator	Denominator
	Count of Final Trunk Groups that Exceed Blocking Threshold, for two consecutive months, exclusive of trunks that block due to CLEC network problems as agreed by CLECs.	Not applicable
NP-1-04	Number Final Trunk Groups Exceeding Blocking Standard – 3 Months	
Calculation	Numerator	Denominator
	Count of Final Trunk Groups that Exceed Blocking Threshold, for three consecutive months, exclusive of trunks that block due to CLEC network problems as agreed by CLECs.	Not applicable


Bell Atlantic
Telecom Industry Services
D.C. Interconnection Trunking Forecast Guide
February 1999

Introduction

Introduction	The purpose of this CLEC Interconnection Trunking Forecast Guide and attached documents is to provide guidelines for the formats and language to be used in exchanges of forecast information between CLECs and Bell Atlantic. **These guidelines in no way supersede any established or future Interconnection Agreements between Bell Atlantic and individual CLECs.** The Bell Atlantic CLEC Interconnection Trunking Forecast Process is an interactive planning process between the CLECs and Bell Atlantic. This recommended process represents a work in progress and may be modified as appropriate.
Initial Implementation	The Trunk Forecasting Process was implemented to meet the requirements of Bell Atlantic's forecasting and capital budget process.
Evaluation	The Trunk Forecasting Process will be monitored by Bell Atlantic with input from all CLECs to evaluate the success of the forecast process.

CLEC Interconnection Trunking Forecast Process

Why Do We Need Forecasts?	1. To ensure that trunk groups do not exceed their design blocking thresholds. 2. To ensure adequate infrastructure planning to meet customer service requirements within standard intervals. 3. CLECs and Bell Atlantic analyze forecast information in order to: • Design optimum network infrastructure. • Prioritize and allocate limited capital funds for next year's switching, transport and OSS projects. • Allocate expense budgets and human resources.
Impact of Unforecasted Demand	Unforecasted Demand Forces: • Blockage that exceeds design blocking thresholds. • Redesign of infrastructure network in various areas. • Sub-optimization of planned aggregate infrastructure. • Reallocation of funds for infrastructure. • Reprioritizing, rescheduling, or cancellation of planned projects. • Reallocation of human resources.

When Will This Trunk Forecast be Provided?	On a semiannual basis, CLECs will be requested to provide Bell Atlantic with at least a two year detailed forecast of its traffic and volume requirements for all CLEC Interconnection Trunking. This should include requirements for both new growth and change in volumes. **This forecast must be provided on February 1st and August 1st each year.** To facilitate the forecast, Bell Atlantic's TIS Account Team will send out a letter with a 3.5Mb diskette (with an attached BA Excel forecast spreadsheet) to each CLEC
How will feedback be provided on the process?	Bell Atlantic will review the forecast and provide feedback to individual CLECs as appropriate. A CLEC or Bell Atlantic can also request a meeting to discuss the forecast process.
Degree of Confidence	The CLEC should strive to provide Bell Atlantic with a high degree of accuracy. The remarks section of the forecast template should be used to identify high priority requirements and indicate special considerations. Bell Atlantic may use the remarks as a guide for discussions at joint meetings.
Distribution of the Official Forecast	Forecasts will only be made available to those parties within Bell Atlantic with a need to know and will be in compliance with the appropriate Interconnection Agreements. For example, Bell Atlantic-Telecom Industry Services, Bell Atlantic - Network Forecasting and Network Provisioning groups. Individual CLEC forecasts will not be shared with other CLECs or Bell Atlantic Retail.
How should each party provide feedback to the other of a spike in demand/project that is Unforecasted for the current year?	Each party will notify the other when they project a significant short term spike in demand which has the potential to impact infrastructure and/or workforce balance. This notification will be done via letter to the other party (ex. CLEC obtains a new ISP) via the respective account managers. A copy may be sent to the appropriate provisioning group in Bell Atlantic. For example, significant changes can include : • A new CLEC POI • Advancing or delaying significant trunk requirements from one year to another • Unforecasted trunking requirements • New Switch
Joint Network Planning Reviews	May be called by either party as required. These meetings will include engineering representatives from each party. May include discussions on changes in POI, additional transport requirements, additional trunking requirements, significant advances or delays in requirements from one year to another.

CLEC Interconnection Trunking Forecast Guide

Forecast Template Field Definitions

Header Section

1. **CLEC Name:**

   DEFINITION: This field identifies the Telecommunications Carrier issuing the trunk forecast.

   EXAMPLE: ABC Telecom

2. **Forecast Issue Date:**

   DEFINITION: This field identifies the date the trunk forecast is issued by the Telecommunications Carrier.

   EXAMPLE: 2/1/98

3. **Issued By:**

   DEFINITION: This field identifies the name and the title of the person issuing the Forecast for the CLEC.

   USAGE: This information will be used by Bell Atlantic to contact the CLEC if additional information concerning the forecast is required.

   EXAMPLE: Jane Doe, Network Manager

4. **Reach Number:**

   DEFINITION: This field identifies the Telephone Reach Number of the CLEC employee who originated this trunk forecast. The field should contain a three-digit area code, three-digit exchange, and a four-digit line number.

   USAGE: This information will be used by Bell Atlantic to contact the CLEC if additional information concerning the forecast is required.

   EXAMPLE: 1-800-555-1212

5. **LATA:**

   DEFINITION: This field indicates the LATA which the trunk group(s) forecast will serve. A separate forecast template should be prepared for each LATA for which the CLEC is providing trunk forecasts.

   USAGE: This information will be used to distribute the forecasts to appropriate personnel within Bell Atlantic.

   EXAMPLE: 132

Trunk Group Specific Section

6. **ACTL (Access Customer Terminal Location / POI (Point of Interface):**

   DEFINITION: This field identifies the CLLI Code of the Terminal Location / POI of the CLEC providing the IntraLata Service. If the CLEC does not have a CLLI Code for a particular ACTL / POI, the CLEC should contact their Bell Atlantic account manager to obtain a code prior to the submission of the trunk forecast.

   USAGE: This field identifies the physical drop-off point of traffic to the CLEC.

   EXAMPLE: GRCYNYAANMD

7. **TSC (Two Six Code) / NEW:**

   DEFINITION: This field identifies the unique number assigned to the Trunk Group by Bell Atlantic. **For new trunk groups, indicate "New" in the field.**

   USAGE: This field assures that Bell Atlantic and the CLEC are referencing the appropriate trunk group.

   EXAMPLE: AQ123456

8. **BELL ATLANTIC CLLI:**

   DEFINITION: This field is the eleven (11) character CLLI (Common Language Location Identification) Code of the Bell Atlantic switch.

   USAGE: The CLLI identifies the Bell Atlantic switch in unique terms.

   EXAMPLE: GRCYNYCG02T

9A. **TO (Traffic Origination)**

   DEFINITION: This field is used to identify the direction of traffic for each trunk group between Bell Atlantic and the CLEC.

   USAGE: The following codes should be used. **BA**= Traffic originates with Bell Atlantic, **CL**= Traffic originates with CLEC, **2W** = Two Way Traffic

   EXAMPLE: BA, CL, 2W

9. DS (Direction and Type of Signaling)

DEFINITION: This field is a two character code which identifies the direction of traffic movement for trunk groups and the type of pulsing signals between the Bell Atlantic and CLEC location. Refer Bellcore standard XXX for a complete list of definitions. The following table represents the most common selections:

DS	Description
MM	Two way MF pulsing
-M	MF pulsing from CLEC to Bell Atlantic
M-	MF pulsing from Bell Atlantic to CLEC
77	Two way SS#7 pulsing
-7	SS#7 pulsing from CLEC to Bell Atlantic
7-	SS#7 pulsing from Bell Atlantic to CLEC

USAGE: This field is required to help identify the components necessary to build the trunk group.

EXAMPLE: MM

10. **CLEC SWITCH CLLI:**

DEFINITION: This field is the eleven (11) character CLLI code of the CLEC Switch.

USAGE: The CLLI identifies the CLEC switch in unique terms.

EXAMPLE: GRCYNYAADS0

11. **INTERFACE TYPE (Point of Interconnection)**

DEFINITION: This element describes the Interface Group desired for this traffic. These Groups relate to the CLEC POI Interface Groups for Switched Access Service.

Interface Type	CLEC/Bell Atlantic Point of Interconnection
DS1	DS1 Level High Speed Digital (1.544 MBPS)
DS3	DS3 Level High Speed Digital (44.736 MBPS)

USAGE: This field is required on all documents.

EXAMPLE: DS1

12. **56 KB or 64 Clear Channel:**

DEFINITION: This field defines the requirement for either 56KB or 64 clear channel on this trunk group.

USAGE: This field is required to help identify the components necessary to build the trunk group.

EXAMPLE: 56 or 64

Current Year Trunk Requirements

13. **Trunks In-Service As Of Forecast Issue Date:**

DEFINITION: This field identifies the number of **DS0** trunks In Service for this trunk group as of the date of the forecast.

USAGE: This information gives Bell Atlantic evaluates the starting point for this forecast.

EXAMPLE: 192

14. **1Q FCST, 2Q FCST, 3Q FCST, 4Q FCST:**

DEFINITION: These fields indicate the cumulative trunk quantity forecasted for each quarter of the current year. Quantities indicate end of quarter requirements. As quarterly updates are provided, fields for past quarters should be used to indicate actual in-service amounts.

USAGE: This information will identify any changes in requirements for the current year.

EXAMPLE: 192 Trunks (Only the number of DS0 trunks required)

Trunk Forecast Requirements - Current Year + 1

15. **1Q, 2Q, 3Q, 4Q:**

DEFINITION: These fields indicate the cumulative trunk quantities forecasted to be required for the First Future Year (Current Year +1) by quarter for that year. Quantities indicate end of quarter requirements.

USAGE: This information provides and indication of timing as well as volumes for the forecast year.

EXAMPLE: 216 Trunks (Only the number of DS0 trunks required)

16. Trunk Forecast Requirements - Current Year + 2 :

DEFINITION: This field indicates the cumulative trunk quantities forecasted to be required for the second future Year (Current Year +2) as of the end of the year.

USAGE: This information provides volumes for the forecast year.

EXAMPLE: 216 Trunks (Only the number of DS0 trunks required)

Other

17. **REMARKS:**

DEFINITION: This field is used to expand upon/clarify-forecast data for each trunk group. It should be used to identify the sizing and timing of major projects, major shifts in demand, new switches etc.

USAGE: This field should be used to identify high priority requirements and other forecast items to be included in correspondence and discussions with Bell Atlantic.

EXAMPLE: Will be establishing new POI in late in year 2000.

Bell Atlantic
Telecom Industry Services

CLEC Interconnection Trunking Forecast

CLEC Name :	1	Forecast Issue Date:	2
Issued By:	3	Reach Number:	4

LATA: 5

6	7	8	9A	9	10	11	12	13	14	14	14	14

Bell Atlantic
Telecom Industry Services

CLEC Interconnection Trunking Forecast

CLEC Name :	1	Forecast Issue Date:	2
Issued By:	3	Reach Number:	4

LATA:	5

6	7	8	9A	9	10	11	12	15	15	15	15

51 - 81

Bell Atlantic
Telecom Industry Services

CLEC Interconnection Trunking Forecast

CLEC Name :	1	Forecast Issue Date:	2
Issued By:	3	Reach Number:	4

LATA:	5

6	7	8	9A	9	10	11	12	16

Bell Atlantic
Telecom Industry Services

CLEC Interconnection Trunking Forecast

CLEC Name :	1	**Forecast Issue Date:**	2
Issued By:	3	**Reach Number:**	4

Appendix I - Part 2

LATA:	5

6	7	8	9A	9	10	11	12	17

Bell Atlantic
Telecom Industry Services

CLEC Interconnection Trunking Forecast

CLEC Name :	ABC Telecom	Forecast Issue Date:	2/1/98
Issued By:	J. Doe Network Mgr.	Reach Number:	914-555-1212

LATA: 132

GRCYNYAANMD	AN123456	GRCYNYGC02T	2W	MM	GRCYNYAADS0	DS1	56	72	72	72	96
BRWDNYAANKD	AN234567	BRWDNYBW01T	C	-7	BRWDNYAADS1	DS1	56	48	48	72	72
GRCYNYAANMD	AN246802	LVTWNYLTDS0	B	7-	GRCYNYAADS1	DS1	56	192	192	192	192
BRWDNYAANKD	NEW	SYOSNYSYDS0	2W	77	BRWDNYAADS0	DS1	64	0	0	48	48

Bell Atlantic
Telecom Industry Services

CLEC Interconnection Trunking Forecast

CLEC Name :	**ABC Telecom**	**Forecast Issue Date:**	**2/1/98**
Issued By:	**J. Doe Network Mgr.**	**Reach Number:**	**914-555-1212**

LATA:	**132**

GRCYNYAANMD	AN123456	GRCYNYGC02T	2W	MM	GRCYNYAADS0	DS1	56	96
BRWDNYAANKD	AN234567	BRWDNYBW01T	C	-7	BRWDNYAADS1	DS1	56	72
GRCYNYAANMD	AN246802	LVTWNYLTDS0	B	7-	GRCYNYAADS1	DS1	56	192
BRWDNYAANKD	NEW	SYOSNYSYDS0	2W	77	BRWDNYAADS0	DS1	64	48

Bell Atlantic
Telecom Industry Services

CLEC Interconnection Trunking Forecast

CLEC Name :	**ABC Telecom**	**Forecast Issue Date:**	**2/1/98**
Issued By:	**J. Doe Network Mgr.**	**Reach Number:**	**914-555-1212**

LATA: 132

GRCYNYAANMD	AN123456	GRCYNYGC02T	2W	MM	GRCYNYAADS0	DS1	56	96	120	120	120
BRWDNYAANKD	AN234567	BRWDNYBW01T	C	-7	BRWDNYAADS1	DS1	56	96	96	120	120
GRCYNYAANMD	AN246802	LVTWNYLTDS0	B	7-	GRCYNYAADS1	DS1	56	192	544	544	784
BRWDNYAANKD	NEW	SYOSNYSYDS0	2W	77	BRWDNYAADS0	DS1	64	72	72	96	96

Bell Atlantic
Telecom Industry Services

CLEC Interconnection Trunking Forecast

CLEC Name :	**ABC Telecom**	**Forecast Issue Date:**	**2/1/98**
Issued By:	**J. Doe Network Mgr.**	**Reach Number:**	**914-555-1212**

LATA:	**132**

GRCYNYAANMD	AN123456	GRCYNYGC02T	2W	MM	GRCYNYAADS0	DS1	56	240
BRWDNYAANKD	AN234567	BRWDNYBW01T	C	-7	BRWDNYAADS1	DS1	56	168
GRCYNYAANMD	AN246802	LVTWNYLTDS0	B	7-	GRCYNYAADS1	DS1	56	1328
BRWDNYAANKD	NEW	SYOSNYSYDS0	2W	77	BRWDNYAADS0	DS1	64	192

Bell Atlantic
Telecom Industry Services

CLEC Interconnection Trunking Forecast

CLEC Name :	ABC Telecom	Forecast Issue Date:	2/1/98
Issued By:	J. Doe Network Mgr.	Reach Number:	914-555-1212

LATA:	132

GRCYNYAANMD	AN123456	GRCYNYGC02T	2W	MM	GRCYNYAADS0	DS1	56	
BRWDNYAANKD	AN234567	BRWDNYBW01T	C	-7	BRWDNYAADS1	DS1	56	
GRCYNYAANMD	AN246802	LVTWNYLTDS0	B	7-	GRCYNYAADS1	DS1	56	Adds rqd by Apr 15 & Dec 1 1999
BRWDNYAANKD	NEW	SYOSNYSYDS0	2W	77	BRWDNYAADS0	DS1	64	New POI may 1, 1998

COX EXHIBIT NO. 19
✓Admitted

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October 9, 2001

VIA HAND DELIVERY

Dorothy T. Attwood, Esq.
Chief, Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Petition of Cox Virginia Telcom, Inc. for Arbitration of an Interconnection Agreement with Verizon Virginia Inc.
CC Docket No. 00-249

Dear Ms. Attwood:

I am writing to you on behalf of Cox Virginia Telcom, Inc. ("Cox") concerning the status of Cox's motion to enforce the Commission's August 17 Order in the above-referenced proceeding. As you know, that motion addressed issues relating to the implementation of the Commission's order partially granting Cox's motion to strike Verizon's proposed contract language for Issue I-5, which concerns compensation for ISP-bound traffic. I am authorized to inform you that Verizon Virginia Inc. has reviewed and approved this letter.

On October 2, 2001, Verizon transmitted new proposed contract language for Issue I-5 to Cox.[1] That language is attached. Cox has reviewed the language and concluded that it is sufficient to comply with the requirements of the August 17 Order. Consequently, Verizon will substitute the new language for the corresponding language in its earlier proposal and Cox will withdraw the motion to enforce.

Verizon's substitution of this language does not resolve Issue I-5 between Cox and Verizon, and so both parties continue to intend to put on their witnesses during the hearing.

[1] Cox did not receive the new language from Verizon until after Cox had filed a letter seeking Commission action on the motion to enforce the August 17 order.

Please inform me if any questions should arise in connection with this letter.

Respectfully submitted,

J.G. Harrington

JGH/

Attachment

cc: As per attached service list